

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

UNITED STATES OF AMERICA) CASE# 5:21CR00009
)
vs.)
)
)
Charles Michael King)

UNOPPOSED MOTION TO PERMIT TRAVEL TO MEDICAL APPOINTMENT

Comes now, the undersigned attorney, **JACK MORRIS DOWNIE**, and files this Unopposed Motion to permit travel to a medical appointment a shows the Court the following:

- a. Charles Michael King is currently on a pretrial release in the above-referenced case.
- b. An order setting conditions of release was signed by Judge Benjamin W. Cheesbro on November 23, 2021. [Document 126]
- c. Under the additional conditions of release section in the order setting conditions of release [Document 126], in paragraph 7, subsection (f): “Travel is Restricted to the Southern District of Georgia”
- d. Defendant respectfully requests to be able to travel to accompany his wife, Sherry L King to the Baptist MD Anderson Cancer Center located at 1301 Palm Avenue, Jacksonville, Florida 32207 for her appointment with her medical provider Brittany P. Barrow scheduled for February 9th, 2022 at 9:00 a.m.
- e. Defendant’s counsel has conferred with the Assistant United States Attorney Tania Groover and this Motion to permit permanent travel to accompany the Defendant’s spouse to her medical provider appointment is unopposed by the Government.

- f. The defendant is not asking to modify any other conditions of pretrial release and
Defendant will continue to abide by all conditions of pretrial release as ordered.
- g. Defendant has attached a copy of the appointment notice with this motion as Defendant's
exhibit A.

WHEREFORE, the defendant, Charles Michael King prays that his Unopposed Motion to Permit Travel to Medical Appointment be Granted.

Respectfully submitted this 24th day of January 2022.

/S/Jack M. Downie
JACK M. DOWNIE
Georgia Bar # 813753
Post Office Box 926
Vidalia, Georgia 30475
(912) 537-9265

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of electronic filing.

Respectfully submitted this 24th day of January 2022.

/S/Jack M. Downie
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